

**WILLKIE FARR & GALLAGHER**

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AMERICAN OVERSIGHT BOARD  
FEDERAL COMMUNICATIONS COMMISSION

November 12, 2002

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability; CC Docket Nos. 99-200, 96-98, 95-116

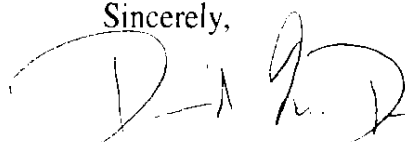
Dear Ms. Dortch:

Scott Jarus, Philip Verveer, and I, on behalf of j2 Global Communications, Inc. ("j2 Global"), met with Dan Gonzalez, senior legal advisor to Commissioner Martin. We discussed j2 Global's pending petition for reconsideration of the Third Report and Order and Second Order on Reconsideration in the above-captioned docket. We explained that j2 Global's services should not be segregated into separate technology-specific area codes and that if states were permitted to do so, competition for unified communications services would be harmed. In particular, we explained that while j2 Global's services are not "new" services, it is only within the last several years that they have been offered to the so-called "SOHO" (small office, home office) and residential markets by service providers such as j2 Global. Previously, these services were limited to large companies willing to invest significant sums in hardware and software upgrades.

In addition, we discussed j2 Global's opposition to the Connecticut Department of Public Utility Control's request to adopt a service specific area code for unified messaging as well as the recent request by the California Public Utilities Commission to do the same.

In accordance with the Commission's rules, I am submitting two copies of this letter

Sincerely,



David M. Don

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C-14  
UNCLASSIFIED

cc: Dan Gonzalez